

EXHIBIT 4

From: [Bender, Kristin](#)
To: [Glover, Joel](#)
Subject: RE: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-CV-10049 (LJL)
Date: Friday, August 22, 2025 3:20:20 PM
Attachments: [image001.png](#)

Caution: **External Email.

For your reference –

- All Documents and Communications between You, any Wayfarer Defendant, Bryan Freedman, Liner Freedman Taitelman + Cooley LLP, or anyone acting on their behalf from December 1, 2023 to the present concerning efforts to seed, influence, manipulate, boost, amplify, or engage with social media algorithms, narrative or virality, as well as the use of bots or inauthentic accounts.

Kristin Bender
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From: Glover, Joel <jglover@jw.com>
Sent: Friday, August 22, 2025 3:27 PM
To: Bender, Kristin <KBender@willkie.com>; Babcock, Chip <cbabcock@jw.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Esra Hudson <ehudson@manatt.com>; Stephanie Roeser <sroeser@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; laura.prather@haynesboone.com; michael.lambert@haynesboone.com
Subject: RE: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-CV-10049 (LJL)

*** EXTERNAL EMAIL ***

I am open between now and 4:30pm Central. My cell is best: [REDACTED].

Joel Glover | Partner
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From: Bender, Kristin <KBender@willkie.com>
Sent: Friday, August 22, 2025 2:45 PM
To: Glover, Joel <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Esra Hudson <ehudson@manatt.com>; Stephanie Roeser <sroeser@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Taustine, Melissa

<MTaustine@willkie.com>; laura.prather@haynesboone.com; michael.lambert@haynesboone.com
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Hi Joel,

Thanks for your quick response – we appreciate it.

We are amenable to the stop date of February 18, 2025 as a compromise position.

Do you have a few minutes to connect on the remainder? Trying to get a few things squared away this afternoon in light of the Court's motions deadline this afternoon.

Thanks much,

Kristin

Kristin Bender

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From: Glover, Joel <jglover@jw.com>

Sent: Friday, August 22, 2025 12:07 AM

To: Bender, Kristin <KBender@willkie.com>; Babcock, Chip <cbabcock@jw.com>

Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Esra Hudson <ehudson@manatt.com>; Stephanie Roeser <sroeser@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; laura.prather@haynesboone.com; michael.lambert@haynesboone.com

Subject: RE: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-CV-10049 (LJL)

*** EXTERNAL EMAIL ***

Kristin,

We will produce the remaining documents based on our correspondence below (and here) by next Friday (August 29) and likely earlier. We will produce any applicable privilege log by next Friday, as well. This email otherwise responds to your email from late this afternoon (requesting a response today), which I note expands on your prior email about what issues actually remained following our productive calls about this.

RFPs 10-11 Timeframe: We still disagree that the December 1, 2023, start date is

appropriate. The proper start date remains July 1, 2024, particularly where the only justification we've received is "in light of the relevance" and nothing more.

We also do not agree that our clients' productions and privilege logs should extend through March 3, 2025. As we discussed, our clients sought and used counsel to defend themselves as soon as your client filed and then disclosed a CRD Complaint against them in California, which was December 20, 2024. So all of the ensuing communications are privileged. But to compromise, we can agree to produce, or log on a privilege log, documents and communications extending through February 18, 2025, which is the date of Ms. Lively's Amended Complaint filed in this Court, which added Mr. Wallace and Street as Defendants, even though it was subsequently dismissed for lack of jurisdiction.

RFP 10: We don't have an engagement letter with Mr. Freedman or his firm for matters other than this one during the relevant timeframe (even considering the expansive December 1, 2023, timeframe advanced by Ms. Lively).

RFP 11: The production Ms. Lively has long had includes all documents and communications about business, engagements, or work performed by Street or Mr. Wallace for, or in connection with, any Wayfarer Defendants in this suit. In other words, if it's related to this case and is related to any of the Wayfarer Defendants, Ms. Lively already has it from Street and Mr. Wallace—and has for a long time.

For both of these RFPs, your email from today now finally makes clear to us the purpose of Ms. Lively's request here. But despite her aims, pursuing these documents, which Ms. Lively recognizes are unrelated to the facts of this lawsuit, will needlessly reveal the details of highly sensitive and confidential matters for other clients. No protective order could ever undo that. This is hardly the type of proportionality required by Rule 26.

RFPs 18-21: We agree to produce documents sufficient to show all payments and individuals/entities, with sensitive information redacted, relating to individuals or entity/entities from which Street or Mr. Wallace received payment in connection with any work performed relating directly or indirectly to Lively, Wayfarer, Baldoni, or the Actions. And to reiterate, neither Street nor Mr. Wallace have ever paid anyone in connection with the three months of work they did on this engagement.

Happy to discuss.

Best,
Joel

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From: Bender, Kristin <KBender@willkie.com>
Sent: Thursday, August 21, 2025 4:39 PM
To: Glover, Joel <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Esra Hudson <ehudson@manatt.com>; Stephanie Roeser <sroeser@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; laura.prather@haynesboone.com; michael.lambert@haynesboone.com
Subject: RE: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-CV-10049 (LJL)

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Joel,

Thanks for your response. I've outlined a few responses below, if you could please provide any positions today, along with indicating when any additional productions will be made, and when the privilege log(s) will be provided. If easier, I am available to discuss.

Yes, December 1, 2023 is the appropriate start date for RFPs 10-11, as identified on the face of the RFPs. July 1, 2024 is the appropriate start date for the remainder of the RFPs, as indicated in Instruction No. 2 of the Requests. We believe the extended time frame is necessary in light of the relevance of the information requested in RFPs 10-11. Can you please explain how documents and communications prior to July 1, 2024 would be privileged?

On our last call, we discussed whether Street and Mr. Wallace agree that their productions and privilege logs extend through March 3, 2025. Can you please confirm your position on whether Mr. Wallace and Street will be producing documents (or reflecting them as on the privilege log) post-dating December 20, 2024?

With respect to RFP 10, the Request is broader than you have described below. The Request seeks documents and communications between Street/Mr. Wallace and Freedman regarding the nature and duration of the relationship, which includes documents and communications reflecting that they are friends, or have worked together for a long time, as two examples. This is directly relevant to Ms. Lively's allegations as it evidences how they communicated and work together to perform the alleged conduct. *E.g.*, ECF No. 521 ¶ 221 (indicating close friendship between Freedman and Jed). You are correct that RFP 10 also includes (but is not limited to) engagement letters, which are not privileged and should be produced. *See, e.g.*, *Newmarkets Partners, LLC v. Sal. Oppenheim Jr. & Cie. S.C.A.*, 258 F.R.D. 95, 103 (S.D.N.Y. 2009) (engagement letters are not entitled to work-production protection because they "contain no legal analysis" and do not reveal counsel's mental processes

about the litigation); *Robinson v. De Niro*, No. 19CV9156LJLHP, 2022 WL 704922, at *9 (S.D.N.Y. Mar. 9, 2022) (“As to the retainer agreement . . . the Second Circuit has consistently held that ‘in the absence of special circumstances client identity and fee arrangements do not fall within the attorney-client privilege because they are not the kinds of disclosures that would not have been made absent the privilege and their disclosure does not incapacitate the attorney from rendering legal advice.’”); *Brodsky v. Kaleida Health*, No. 01-CV-0676SR, 2007 WL 9777691, at *2 (W.D.N.Y. Oct. 25, 2007) (declining to find retainer agreements privileged as to consultant retained by counsel). Please confirm your position as to RFP 10 and what will be produced.

With respect to RFP 11, when you say that “[a]ny documents and communications with the Wayfarer Defendants regarding Street’s engagement have already been produced,” can you please confirm that the production includes all documents and communications concerning business, engagements, or work performed by Street and Jed for, or in connection with, any Wayfarer Defendant including, but not limited to, directly pursuant to Jed and Street’s executed engagement with Wayfarer (i.e., please confirm Jed and Street have produced all documents and communications concerning business, engagements or work performed by Street or Jed for or in connection with any Wayfarer Defendant relating to Lively, any Wayfarer Defendant, or the Actions, including such materials that pre-date or post-date any executed engagement)? Additionally, please confirm that Street and Mr. Wallace have not produced documents and communications: (1) concerning business, engagements, or work performed for, or in connection with Mr. Freedman or Liner about the Wayfarer engagement (or otherwise relating to Lively or any Wayfarer Defendants, or the Actions) and (2) relating exclusively to clients other than Baldoni or Wayfarer, even if they involve any Wayfarer Defendant, Bryan Freedman, Liner Freedman Taitelman + Cooley LLP, or anyone acting on their behalf?

With respect to RFP 22, thank you for agreeing to produce this document.

As to the financial information (as relevant to RFPs 18-21), I believe we are largely agreeable to your suggestion regarding payment information. To put a finer point on it, we are amenable to Street and Mr. Wallace producing documents sufficient to show all payments (including check payment or incoming wire information) and individuals/entities, with sensitive information redacted, relating to individuals or entity/entities from which Street or Mr. Wallace received or made payment in connection with any work performed relating directly or indirectly to Lively, Wayfarer, Baldoni, or the Actions. If that is workable, it will also resolve any remaining dispute over Interrogatory No. 11.

Many thanks,
KB

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From: Glover, Joel <jglover@jw.com>
Sent: Wednesday, August 20, 2025 6:52 PM
To: Bender, Kristin <KBender@willkie.com>; Babcock, Chip <cbabcock@jw.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Esra Hudson <ehudson@manatt.com>; Stephanie Roeser <sroeser@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; laura.prather@haynesboone.com; michael.lambert@haynesboone.com
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*** EXTERNAL EMAIL ***

Kristin,

Thanks for your patience while we looked into this.

To clarify, does the “extended December date range” mean beginning in December 2023? If so, thank you for limiting it to RFPs 10-11. It is still unclear to us what is relevant about going back to December 2023, given that Street was not retained until August 2024. Either way, whether the start date is December 2023 or July 2024, the main difference will be the length of our clients’ privilege logs.

RFP 10 appears to seek any engagement letter details about the scope of work that Liner Freedman Taitelman + Cooley LLP was retained to provide for Mr. Wallace or Street. Those documents and communications are privileged and, to the extent any exist during this timeframe, will be reflected in our clients’ privilege logs now that we understand the scope of this request.

RFP 11 is still unlimited and overbroad. Any documents and communications with the Wayfarer Defendants regarding Street’s engagement have already been produced. If this RFP also seeks any documents and communications regarding Street or Mr. Wallace’s engagement or work before or in connection with Liner Freedman Taitelman + Cooley LLP for engagements totally unrelated to the Wayfarer Defendants or Plaintiff (and related entities), our understanding is that these documents are not only privileged, but irrelevant to the issues in this case.

RFP 22 relates to one document that provides a high-level overview of Street’s services that was sometimes provided to prospective clients. It was not provided to Wayfarer. But in the spirit of cooperation, we will produce it. There are no other documents responsive to this RFP.

There are no documents responsive to RFP 51.

Finally, we can produce documents sufficient to show either check payment or incoming wire information, with sensitive information redacted, reflecting the entity/entities from which Street received payment for its engagement with Wayfarer. Does that work?

We can make the additional document production by Monday, with a privilege log to follow shortly after that.

Happy to discuss.

Best,
Joel

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From: Bender, Kristin <KBender@willkie.com>
Sent: Thursday, August 14, 2025 12:41 PM
To: Glover, Joel <iglover@jw.com>; Babcock, Chip <cbabcock@jw.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Esra Hudson <ehudson@manatt.com>; Stephanie Roeser <sroeser@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; laura.prather@haynesboone.com; michael.lambert@haynesboone.com
Subject: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-CV-10049 (LJL)

Caution: **External Email.

Hi Joel,

In connection with our recent conferral regarding the Wallace/Street Relations discovery, I am writing to confirm that the only RFPs subject to the extended December date range are RFP Nos. 10-11, with everything else falling in the date range starting July 1, 2024.

Can you please also confirm that there are no responsive documents to RFP No. 22 and 51, which are referenced below? Those were omitted from our deficiency letter but we are happy to confer on them if the representation is other than that they do not exist, which, in the case of RFP No. 51, would also indicate that there is no longer access to any account(s) that might reflect that activity.

We also owed you a response regarding information requested in connection to financial institutions. The production of information regarding the financial institutions and account holders

associated with bank accounts from which Jed or SR received payment in connection with the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, any Wayfarer Defendant, the Digital Campaign, or the Consolidated Action would be sufficient to satisfy the discovery requested as to these items, with appropriate redactions as needed.

Best,
Kristin

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RFP 10: All Documents and Communications between You, Bryan Freedman, Liner Freedman Taitelman + Cooley LLP, or anyone acting on their behalf from December 1, 2023 to the present concerning the nature or duration of Your relationship with Bryan Freedman or Liner Freedman Taitelman + Cooley LLP

RFP 11: All Documents and Communications between You, any Wayfarer Defendant, Bryan Freedman, Liner Freedman Taitelman + Cooley LLP, or anyone acting on their behalf from December 1, 2023 to the present concerning business, engagements, or work performed by You for, or in connection with, any Wayfarer Defendant, Bryan Freedman, or Liner Freedman Taitelman + Cooley LLP

RFP 22: All Documents and Communications relating to any promotional materials or descriptions of work, technology, tools, or capabilities regarding, performed by, or concerning Street Relations, Inc., You, or anyone on Your behalf.

RFP 51: All Documents and Communications concerning services or activities related to Reddit regarding the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, any Wayfarer Defendant, the Digital Campaign, the Marketing Plan, or the Consolidated Action.

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